

EXHIBIT 1

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GEORGE MANDALA and CHARLES BARNETT,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

NTT DATA, INC.,

Defendant.

Case No. 6:18-cv-06591-CJS

**DECLARATION OF PATRICIA
PRICE**

Patricia Price, of full age, hereby declares as follows:

1. I am employed by Defendant NTT DATA, Inc. as a Senior Recruiter. In my role, I am responsible for recruiting for various NTT DATA job postings and engaging with potential candidates. I have personal knowledge of the matters contained herein and submit this Declaration in support of NTT DATA's Motion to Dismiss the Class Action Complaint in its Entirety and with Prejudice.

2. I am the recruiter that worked with Plaintiff George Mandala when he applied for a position with NTT DATA, Inc.

3. I reviewed a copy of the Class Action Complaint filed in the above-referenced matter. In Paragraph 30 of the Class Action Complaint, Plaintiffs allege, in part, that "Mr. Mandala authorized a background check...".

4. Attached hereto as **Exhibit A** is a true and correct copy of the signed background check authorization form that I received from Plaintiff George Mandala, which is referenced in Paragraph 30 of the Class Action Complaint.

5. As noted in the executed authorization, Plaintiff George Mandala acknowledged receipt of Article 23-A of the New York Correction Law. (Exhibit A).

I declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the foregoing statements made by me are true and correct.

Executed on November 12, 2018


Patricia Price

documents. I hereby authorize the obtaining of "consumer reports" and/or "investigative consumer reports" by the Company at any time after receipt of this authorization and throughout my employment, if applicable. To this end, I hereby authorize, without reservation, any law enforcement agency, administrator, state or federal agency, institution, school or university (public or private), information service bureau, employer, or insurance company to furnish any and all background information requested by **Asurint, Compliance Department, P.O. Box 14730, Cleveland, OH 44145, (800) 906-2034, www.asurint.com/Compliance.aspx**, another outside organization acting on behalf of the Company, and/or the Company itself. I agree that a facsimile ("fax"), electronic or photographic copy of this Authorization shall be as valid as the original.

New York applicants or employees only: By signing below, you also acknowledge receipt of Article 23-A of the New York Correction Law.

Minnesota and Oklahoma applicants or employees only: Please check this box if you would like to receive a copy of a consumer report if one is obtained by the Company. ☐

California applicants or employees only: By signing below, you also acknowledge receipt of the NOTICE REGARDING BACKGROUND INVESTIGATION PURSUANT TO CALIFORNIA LAW. Please check this box if you would like to receive a copy of an investigative consumer report or consumer credit report at no charge if one is obtained by the Company whenever you have a right to receive such a copy under California law. ☐

Signature: George Mandala

Date: 3/20/2017

BACKGROUND INFORMATION

Last Name Mandala First George Middle Elias
 Other Names/Alias _____
 Social Security* # Redacted Date of Birth* Redacted 980
 Driver's License # Redacted State of Driver's License** NY
 Present Address Redacted Phone Number Redacted
 City/State/Zip Rochester, NY 14606
 Former Employer Blackiron Group Position Salesforce Dev Dates of Employment 2011-2016

*This information will be used for background screening purposes only and will not be used as hiring criteria.

** If you will be requesting driving records, we recommend that you have this form notarized.

[Employer Note: If you do business in Utah, you cannot ask for DOB, driver's license, or SSN until either a confidential offer of employment or at the time the background report will be run.]